

### **REMARKS**

Claims 1, 3-12, 14-23 and 25-31 are pending in the present application. By this Response, claims 1, 4, 11, 12, 14, 15, 18-20, 22, 23, 26, 30 and 31 are amended and claims 2, 13 and 24 are canceled. Claims 1, 12 and 23 are amended to recite that the request for content includes an identifier of an accessibility tool and is directed to a first content provider. Claims 1, 12, 23 and 31 are further amended to recite redirecting the request to a second content provider that provides the same content as the first content provider but in a format for use with the accessibility tool. Dependent claims 4, 11, 14, 15, 18-20, 22, 23, 26 and 30 Support for these amendments to the claims may be found at least at page 10, lines 19-27 and page 11, lines 3-10 of the present specification. Reconsideration of the claims in view of the above amendments and following remarks is respectfully requested.

#### **I. Objection to the Specification**

The Office Action objects to the specification requesting updated information for the patent application referenced on page 13, line 10. By this Response, the specification is amended to include the patent application serial number for the reference patent application. Accordingly, Applicants respectfully request withdrawal of the objection to the specification.

#### **II. 35 U.S.C. § 102, Alleged Anticipation**

The Office Action rejects claims 1, 2, 5, 7 and 11 under 35 U.S.C. § 102(e) as being allegedly anticipated by Tso et al. (U.S. Patent No. 6,421,733). This rejection is respectfully traversed.

As to independent claim 1, the Office Action states:

In reference to claim 1, Tso teaches a method of providing access to content (column 1 lines 25-67 and column 8 lines 40-50), comprising:

receiving a request for content from a client device (column 1 lines 25-67 and column 2 lines 44-67);  
determining an accessibility tool to be used in providing the content to a user of the client device (column 3 lines 7-53 and column 7 lines 15-67);  
processing the requested content using the accessibility tool to produce processed content (column 9 lines 25-50); and  
outputting the processed content to the client device (column 9 lines 25-50).

Office Action dated June 17, 2004, pages 2-3.

Amended claim 1 reads as follows:

1. A method of providing access to content, comprising:  
receiving a request for content from a client device, wherein the request includes an identifier of an accessibility tool that is necessary for compensating for a disability of a user of the client device, and wherein the request is directed to a first content provider that provides first content;  
determining an accessibility tool to be used in providing the content to the user of the client device based on the identifier of the accessibility tool;  
redirecting the request for content to a second content provider that provides second content based on the determined accessibility tool, wherein the second content is the same as the first content but the second content is formatted for use with the determined accessibility tool;  
retrieving the second content from the second content provider;  
processing the second content using the accessibility tool to produce processed content; and  
outputting the processed content to the client device.  
(emphasis added)

A prior art reference anticipates the claimed invention under 35 U.S.C. § 102 only if every element of a claimed invention is identically shown in that single reference, arranged as they are in the claims. *In re Bond*, 910 F.2d 831, 832, 15 U.S.P.Q.2d 1566, 1567 (Fed. Cir. 1990). All limitations of the claimed invention must be considered when determining patentability. *In re Lowry*, 32 F.3d 1579, 1582, 32 U.S.P.Q.2d 1031, 1034 (Fed. Cir. 1994). Anticipation focuses on whether a claim reads on the product or process a prior art reference discloses, not on what the reference broadly teaches. *Kalman v. Kimberly-Clark Corp.*, 713 F.2d 760, 218 U.S.P.Q. 781 (Fed. Cir. 1983). Applicants respectfully submit that Tso does not identically show every element of the claimed

invention arranged as they are in the claims. Specifically Tso does not teach a request having an identifier of an accessibility tool, which is a tool that is necessary to compensate for a disability of the user of the client device, determining an accessibility tool to be used based on the identifier of the accessibility tool, or redirecting the request to a second content provider that provides second content that is the same as the first content but formatted for use with the accessibility tool.

Tso is directed to a system for dynamically transcoding data transmitted between computers. With Tso, a transcoder receives data, such as a request for a network object or a reply to such a request, and a parser of the transcoder is used to invoke one or more transcode service providers based upon predetermined selection criterion. The transcoder of Tso may cache both an original version of content and a transcoded version of the content. Moreover, the transcoder of Tso may be part of a remote proxy device.

While Tso generally teaches a transcoder that invokes transcode service providers based upon selection criterion to change requested content prior to it being provided to a client device, there is no teaching in Tso to specifically include an identifier of an accessibility tool, that is necessary to compensate for a disability of a user, in a request from a client device. Furthermore, there is no teaching in Tso to use such an identifier to identify an accessibility tool that is to be applied to the requested content. While Tso teaches that the transcoder may selectively invoke one or more transcode service providers based upon information in a header portion of a received data packet, such as a MIME type or URL, or in the data portion of the data packet, such as key words, particular content, and structures such as heading levels (column 6, line 64 to column 7, line 14), there is no teaching or even suggestion in Tso as to a request including an identifier of an accessibility tool that is necessary to compensate for a disability of a user. Moreover, while Tso teaches that a transcode service provider may be selected based on the above examples of information included in the header or data portions of a data packet, there is no teaching or suggestion in Tso to identifying an accessibility tool based on an identifier of an accessibility tool necessary to compensate for a disability of a user.

In addition to the above, Tso does not teach or even suggest redirection of a request to a content provider that provides the same content as a first content provider but formatted for use with the determined accessibility tool. Again, Tso does not teach

accessibility tools or identifying an accessibility tool that is necessary to compensate for the disability of a user. Moreover, Tso does not identify a content provider that provides content formatted for use with an identified accessibility tool and then redirect a request to this content provider. While Tso teaches caching transcoded versions of information with the transcoder, Tso does not teach that this cached information is associated with an accessibility tool used to compensate for a disability of a user or that a request is redirected to the cache based on a determined accessibility tool. To the contrary, the cache entries in Tso are retrieved only when there is another request for the same transcoded information. The retrieval of the cache entries in Tso is not based on the identification of an accessibility tool for compensating for a disability of a user, the identification being based on an identifier of an accessibility tool in a received request.

Thus, Applicants respectfully submit that Tso does not teach all of the features of the present invention arranged as they are in claim 1. The other independent claims 12, 23 and 31 recite similar features as those discussed above and thus, are distinguished over Tso for similar reasons. At least by virtue of their dependency on claims 1, 12 and 23, Tso does not teach the features of dependent claims 3-11, 14-22 and 25-30. Accordingly, Applicants respectfully request withdrawal of the rejection of claims 1, 5, 7, 11 and respective ones of claims 12-31<sup>1</sup> under 35 U.S.C. § 102(e).

In addition to the above, Tso does not teach the specific features of claims 5 and 11 (and corresponding ones of claims 12-31). For example, with regard to claim 5, Tso does not teach that an accessibility tool is one of a plug-in device to a web browser application, an applet, and an accessibility tool on a server. Again, Tso does not even teach accessibility tools which are tools that compensate for a disability of a user of a client device. While Tso mentions in column 4, lines 1-15 (cited by the Office Action) that the network client may include a browser, this does not teach an accessibility tool that is a plug-in device to a web browser, an applet or a server accessibility tool. Similarly, column 10 (also cited by the Office Action) merely teaches the operations for requesting information from a server and determining if transcoding is necessary using the parser of the transcoder. There is no mention in column 10 of any plug-in, applet, or server accessibility tool, as recited in claim 5.

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<sup>1</sup> See Section V of this Response addressing the statement in the Office Action referencing claims 12-31.

With regard to claim 11, Tso does not teach that determining an accessibility tool includes looking-up an identifier of a user in a registered user directory. The Office Action alleges that this feature is taught at column 9, lines 25-67. This portion of Tso teaches that the transcoder may collect preferences for users and append them to a client request that is sent to a content provider and that a proxy may collect and make available such user preferences. However, there is no teaching in Tso that such information is used to determine an accessibility tool, which is a tool for compensating for the disability of a user.

### **III. 35 U.S.C. § 103, Alleged Obviousness Based on Tso and Webber**

The Office Action rejects claims 3, 4, 8, 9 and 10 under 35 U.S.C. § 103(a) as being allegedly unpatentable over Tso in view of Webber (U.S. Patent No. 6,167,378). This rejection is respectfully traversed.

As discussed above, Tso does not teach or suggest a request that includes an identifier of an accessibility tool that is necessary to compensate for a disability of a user of a client device, determining an accessibility tool to be used in providing content to the user of the client device based on the identifier of the accessibility tool, or redirecting the request for content to a second content provider that provides second content based on the determined accessibility tool, wherein the second content is the same as the first content but the second content is formatted for use with the accessibility tool. Webber, likewise, does not teach or suggest this feature.

Webber is directed to an automated back office transaction method and system. Webber is not concerned with accessibility tools, identifying accessibility tools or retrieving content formatted for use with an identified accessibility tool. Thus, Webber does not teach or suggest any of the above features that are also not found in Tso. Therefore, any alleged combination of Webber and Tso, even if such a combination were possible and one of ordinary skill in the art were somehow motivated to attempt such a combination, still would not result in the invention as recited in independent claim 1 from which claims 3, 4, 8, 9 and 10 depend. Since claims 3, 4, 8, 9 and 10 depend from claim 1 and therefore incorporate the subject matter of claim 1, these dependent claims are also allowable over the alleged combination of Webber and Tso for similar reasons as noted

above with regard to the features of claim 1. Accordingly, Applicants respectfully request withdrawal of the rejection of claims 3, 4, 8, 9 and 10 under 35 U.S.C. § 103(a).

**IV. 35 U.S.C. § 103, Alleged Obviousness Based on Tso, Webber and Albayrak**

The Office Action rejects claim 6 under 35 U.S.C. § 103(a) as being allegedly unpatentable over Tso in view of Webber and further in view of Albayrak (U.S. Patent No. 6,662,163). This rejection is respectfully traversed.

As discussed above, neither Tso nor Webber teach or suggest a request that includes an identifier of an accessibility tool that is necessary to compensate for a disability of a user of a client device, determining an accessibility tool to be used in providing content to the user of the client device based on the identifier of the accessibility tool, or redirecting the request for content to a second content provider that provides second content based on the determined accessibility tool, wherein the second content is the same as the first content but the second content is formatted for use with the accessibility tool. Albayrak, likewise, does not teach or suggest this feature.

Albayrak is directed to a system and method for programming portable devices from a remote computer system. Albayrak is not concerned with accessibility tools, identifying accessibility tools or retrieving content formatted for use with an identified accessibility tool. Thus, Albayrak does not teach or suggest any of the above features that are also not found in Tso and Webber. Therefore, any alleged combination of Tso, Webber and Albayrak, even if such a combination were possible and one of ordinary skill in the art were somehow motivated to attempt such a combination, still would not result in the invention as recited in independent claim 1 from which claim 6 depends. Since claim 6 depends from claim 1 and therefore incorporates the subject matter of claim 1, dependent claim 6 is also allowable over the alleged combination of Tso, Webber and Albayrak for similar reasons as noted above with regard to the features of claim 1. Accordingly, Applicants respectfully request withdrawal of the rejection of claim 6 under 35 U.S.C. § 103(a).

**V. Office Action's Statement with Regard to Claims 12-31**

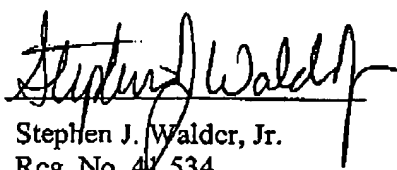
It is noted that the Office Action fails to list any of claims 12-31 as being rejected under any of the actual rejections but merely makes a generalized statement that "Claims 12-31 do not define any new limitations above the teachings of claims 1-11 and are therefore rejected for the above mentioned reasons." It is not clear which "reasons" apply to each of claims 12-31 and thus, the rejection is improper. The Examiner must set forth specific rejections of the claims and cannot merely make blanket statements without identifying the specific basis upon which each claim is rejected. Therefore, Applicants respectfully submit that the alleged rejection of claims 12-31 is improper.

**VI. Conclusion**

It is respectfully urged that the subject application is patentable over the prior art of record and is now in condition for allowance. The Examiner is invited to call the undersigned at the below-listed telephone number if in the opinion of the Examiner such a telephone conference would expedite or aid the prosecution and examination of this application.

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Respectfully submitted,



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